

BAILEY &amp; DIXON, LLP

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January 10, 2022

**Via Electronic Mail/Filing**

Ms. Jocelyn G. Boyd, Esq.  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Opposition of CIGFUR II & III to Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's Motion to Recuse  
**Docket No. 2021-349-E**

Dear Ms. Boyd:

We write on behalf of our clients, the Carolina Industrial Group for Fair Utility Rates II ("CIGFUR II") and the Carolina Industrial Group for Fair Utility Rates III ("CIGFUR III") (together, "CIGFUR"), whose petition to intervene in the above-referenced docket was granted by Chief Hearing Officer Directive Order No. 2021-153-H on December 13, 2021, in response to the Motion to Recuse filed by Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (together, "Duke") in the above-referenced docket on January 7, 2022.

CIGFUR is of the opinion that the relief requested by Duke in its Motion to Recuse is both extraordinary and without merit. In addition, it is worth noting that after a thorough search of the docketing system utilized by the North Carolina Utilities Commission ("NCUC"), CIGFUR has been unable to locate a single instance in which Duke has moved for recusal of an NCUC Commissioner. For these reasons, CIGFUR generally supports the response in opposition to Duke's Motion to Recuse filed today by Google, LLC.

With best wishes, we are

Very truly yours,

Christina D. Cress<sup>1</sup>  
Counsel for CIGFUR II and III

/s/ James H. Goldin  
Local Counsel for CIGFUR II and III

cc: Counsel of Record (via e-mail/e-filing)

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<sup>1</sup> Ms. Cress' motion and verified application for admission *pro hac vice* were filed in this docket on December 13, 2021.

